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**VIA ECFS**

September 24, 2014

Julie Veach  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

RE: *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), WC Docket No. 07-204; Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's Cost Assignment Rules, WC Docket No. 07-21; Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain Legacy Telecommunications Regulations, WC Docket No. 12-61*

Dear Ms. Veach:

As included in CenturyLink-QC<sup>1</sup> and CenturyLink Independent LECs Compliance Plans required by the Commission's *ARMIS Forbearance Order*,<sup>2</sup> the *AT&T Cost Assignment*

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<sup>1</sup> The *Cost Assignment Forbearance Order* (FCC 08-203), *Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering*, 23 FCC Rcd 13647, rel. Sept. 6, 2008, was issued for Qwest Corporation (QC). QC is wholly owned by Qwest Communications International Inc. (QCII). On April 1, 2011, QCII and CenturyLink, Inc. consummated a transaction whereby QCII became a wholly owned subsidiary of CenturyLink, Inc. As a result of that transaction, QC is now known as CenturyLink-QC.

<sup>2</sup> *Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain of the Commission's ARMIS Reporting Requirements; Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 U.S.C. § 160(c), et al.*, Memorandum Opinion and Order, 23 FCC Rcd 13647 (2008), *pets. for recon. dismissed or denied in USTelecom Forbearance Order*, note 4, *infra*, and *appeal dismissed sub nom. NASUCA v. FCC*, No. 08-1353 (D.C. Cir. Aug. 23, 2013).

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*Forbearance Order*,<sup>3</sup> and the *USTelecom Forbearance Order*,<sup>4</sup> please find attached our section 254(k) certification. If you have any questions, please contact me.

Sincerely,

/s/ Melissa E. Newman

Attachment

cc : Marcus Maher ([marcus.maher@fcc.gov](mailto:marcus.maher@fcc.gov))

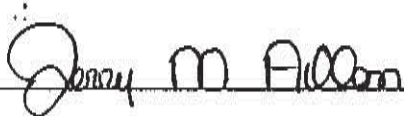
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<sup>3</sup> *Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160 From Enforcement of Certain of the Commission's Cost Assignment Rules*, Memorandum Opinion and Order, 23 FCC Rcd 7302 (2008), *pets. for recon. dismissed or denied in USTelecom Forbearance Order*, note 4, *infra*, and *appeal dismissed sub nom. NASUCA v. FCC*, No. 08-1226 (D.C. Cir. Aug. 23, 2013).

<sup>4</sup> *Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain Legacy Telecommunications Regulations*, Memorandum Opinion and Order, 28 FCC Rcd 7627 (2013), *pet. for rev. pending sub nom. Verizon and AT&T v. FCC*, No. 13-1220 (D.C. Cir. Oral Argument Held Sept. 5, 2014).

## SECTION 254(k) CERTIFICATION

I certify to the best of my knowledge, information, and belief, that CenturyLink-QC<sup>1</sup> and CenturyLink's Independent LECs<sup>2</sup> will comply with their obligations under section 254(k) of the Communications Act of 1934, as amended, and CenturyLink will maintain and provide to the FCC any cost accounting information necessary to establish such compliance if appropriately requested to provide such information.



Jerry M. Allen  
Vice President – Revenues, CenturyLink

Subscribed and sworn to me, a notary public in and for the State of Louisiana  
and the Parish of Union, on this 18<sup>th</sup> day of August,  
2014.

My commission expires on at death, 20\_\_.

  
Notary Public

<sup>1</sup> The Cost Assignment Forbearance Order (FCC 08-203, Released September 6, 2008 in WC Dockets No. 07-21, 07-204 and 05-342) was issued for Qwest Corporation (QC). QC is wholly owned by Qwest Communications International Inc. (QCII). On April 1, 2011, QCII and CenturyLink, Inc. consummated a transaction whereby QCII became a wholly owned subsidiary of CenturyLink, Inc. As a result of that transaction, QC is now known as CenturyLink-QC.

<sup>2</sup> Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain Legacy Telecommunications Regulations, WC Docket No. 12-61, Memorandum Opinion and Order, 28 FCC Red 7627 (2013), pet. for rev. pending sub nom. Verizon and AT&T v. FCC, No. 13-1220 (D.C. Cir. Filed July 15, 2013).